



KEYSTONE CEMENT COMPANY
P.O. BOX A, BATH, PA 18014-0058 TELEPHONE (610) 837-1881



January 29, 2016

Mr. Mark J. Wejkszner, P.E.
Regional Air Quality Program Manager
PA Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18701-1915

Ms. Diana Esher, Director
Air Protection Division
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Keystone Cement Company
Operating Permit No. 48-00003
40 CFR 63, Subpart DDDDD (Major Source Boiler MACT)
Submittal of Notification of Compliance Status**

Mr. Wejkszner and Ms Esher:

On May 31, 2013, Keystone Cement Company (Keystone) submitted an Initial Notification of Applicability to the Pennsylvania Departments of Environmental Protection (PADEP) and the United States Environmental Protection Agency (USEPA) identifying two boilers¹ potentially subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for major Sources: Industrial, Commercial, and Institution Boilers and Process heaters, codified at 40 CFR §63, Subpart DDDDD (also referred to as the Major Source Boiler MACT). The compliance date for existing sources subject to the Major Source Boiler MACT is January 31, 2016. A Notification of Compliance Status (NOCS) must be submitted no later than 60 days after completion of the initial compliance requirement for these sources, or March 31, 2016, whichever is earlier. Keystone has completed the Energy Assessment and Tune-up requirements for the sources subject to this regulation, and submits this NOCS as required.

The following information addresses the applicable NOCS submittal requirements:

40 CFR §63.7545(e)(1); Description of Affected Unit:

- Make: Viking Johansen Boiler, 1997, fuel is #2 fuel oil.

¹ The initial Notification of Applicability identified two boilers potentially subject to this rule. However, one boiler has been removed from service, and Keystone submitted a letter to the PADEP on January 7, 2016 (McGoldrick, Keystone to Wejkszner PADEP), requesting that this boiler be removed from the pending Title V Permit. Therefore, this NOC addresses the one remaining boiler at the facility for which this rule is applicable.

- Identification of applicable subcategory: Units designed to burn light liquid.
- Design heat input capacity: 2.2 MMBtu/hr input.
- Description of add-on controls: None.
- Description of fuel burned: No. 2 fuel oil. No fuels burned in this boiler are a secondary material determined by Keystone or the USEPA through a petition process to be a non-waste under 40 CFR §241.3. Additionally,
- no fuels burned in this boiler are a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR §241.3.

40 CFR §63.7545(e)(8); Certifications of Compliance:

- **40 CFR §63.7545(e)(8)(i):** This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site according to the procedures in 40 CFR §63.7540(a)(10)(i) through (vi). The boiler tune-up was completed on 12/15/2015
- **40 CFR §63.7545(e)(8)(ii):** This facility has had an energy assessment performed according to §63.7530(e). The energy assessment was completed according to Table 3 of Subpart DDDDD by qualified energy assessors on November 18, 2015. The assessment is an accurate depiction of this facility at the time of the assessment, pursuant to 40 CFR §63.7530(e).
- **40 CFR §63.7545(e)(8)(iii):** No secondary materials that are solid waste were combusted in any affected unit.

Although Keystone has been issued a Title V permit, it provides the information required by 40 CFR §63.9(h)(2)(i) as a conservative measure.

- **40 CFR §63.9(h)(2)(i)(A):** The methods that were used to determine compliance: Keystone conducted a boiler tuning and energy assessment.
- **40 CFR §63.9(h)(2)(i)(B):** The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted: Not Applicable.

- **40 CFR §63.9(h)(2)(i)(C):** The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods:
Keystone will conduct a boiler tuning every 5 years.
- **40 CFR §63.9(h)(2)(i)(D):** The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard:
Not Applicable.
- **40 CFR §63.9(h)(2)(i)(E):** If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification):
Not Applicable.
- **40 CFR §63.9(h)(2)(i)(F):** A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method):
There is no air pollution control on this boiler.
- **40 CFR §63.9(h)(2)(i)(G):** A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements:
Keystone has complied with the applicable requirements of 40 CFR part 63, Subpart DDDDD for the affected source.

Please contact me or Scott McGoldrick, Manager, Environmental Compliance at (610) 837-1881, ext. 3213 if you have any questions or need additional information.

Sincerely,



Stephen P. Holt, P.E.
Vice President, Environmental Compliance

TKM/bl

Enclosure

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

I certify that all emission units in this facility are in compliance with all applicable emission limits and work practice standards under 40 CFR part 63 subpart DDDDD.

Signature STP. HOLD Date 01/29/2016